

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

RE: D.I. 964

CERTIFICATION OF COUNSEL

I, Gregory T. Donilon, counsel to Samuel Bankman-Fried, hereby certify as follows:

1. On March 15, 2023, Mr. Bankman-Fried, by and through counsel, filed the *Motion of Samuel Bankman-Fried for Relief from the Automatic Stay, to the Extent Applicable, to Permit Insurers to Advance and/or Reimburse Defense Costs and Fees under Directors and Officers Insurance Policies* [D.I. 964] (the “Motion”).

2. Certain objections and responses to the Motion were filed by the Official Committee of Unsecured Creditors, the Debtors and adversary proceeding plaintiffs Austin Onusz, Cedric van Putten, Nicholas J. Marshall and Hamad Dar (collectively, the “Objectors”).

3. On April 12, 2023, the Court held a hearing on the Motion and issued a ruling denying the Motion without prejudice. Upon issuing its ruling, the Court instructed counsel for Mr. Bankman-Fried to submit a form of order.

4. Attached to this certification as **Exhibit 1** is a form of proposed order (the “Proposed Order”), which counsel for Mr. Bankman-Fried believes accurately reflects this Court’s

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

ruling on the Motion. Counsel for Mr. Bankman-Fried has circulated the Proposed Order to counsel for the Objectors, who have each confirmed that the Proposed Order is acceptable.

5. Counsel for Mr. Bankman-Fried will upload the Proposed Order contemporaneously with the filing of this certification and is available at the Court's convenience should the Court have any questions.

Dated: April 17, 2023
Wilmington, Delaware

Respectfully submitted,

**MONTGOMERY McCRACKEN WALKER &
RHOADS LLP**

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